

EXHIBIT

2

Youngman, Judith

From: Youngman, Judith
Sent: Tuesday, November 7, 2023 10:39 AM
To: Swathi Bojedla
Cc: Reilly, Katie
Subject: RE: AIR-RP Confidential Information & Contract

Swathi,

The excerpted emails are incomplete and misleading. Thus, we believe submitting them to the Court in the proposed form would be improper. We are disappointed that plaintiffs' counsel would choose to proceed in such a manner.

Best, Judith

Judith P. Youngman | Partner

Wheeler Trigg O'Donnell LLP

370 17th Street | Suite 4500 | Denver CO 80202

P 303.244.1865 | F 303.244.1879

youngman@wtotrial.com | wtotrial.com | [vCard](#)



This email contains confidential information from the law firm of Wheeler Trigg O'Donnell LLP and is attorney-client privileged and attorney work product. The information is intended solely for the use of the recipients. The unauthorized disclosure, copying, distribution, or use of the contents of this email is strictly prohibited. If you have received this email in error, please notify us at 303.244.1800 immediately.

From: Swathi Bojedla <sbojedla@hausfeld.com>
Sent: Tuesday, November 7, 2023 7:29 AM
To: Youngman, Judith <Youngman@wtotrial.com>
Cc: Reilly, Katie <Reilly@wtotrial.com>
Subject: RE: AIR-RP Confidential Information & Contract

WARNING: This is an external email. Please take care when clicking links or opening attachments. When in doubt, contact the IS Department at i.s.dept@wtotrial.com

Hi Judith-

We will submit the excerpted emails relevant to our brief, in the form I shared with you on Friday as a courtesy based on your confidentiality concerns. You are welcome to submit the entire email chain in support of your reply, if you wish. I have no objection to you sharing the emails with RealPage's counsel.

SWATHI BOJEDLA

Partner

sbojedla@hausfeld.com

+1 202-540-7150 direct

Pronouns: she/her/hers

HAUSFELD

888 16th Street, N.W.
Suite 300
Washington, DC 20006
+1 202 540 7200
hausfeld.com

This electronic mail transmission from Hausfeld LLP may contain confidential or privileged information. If you believe you have received this message in error, please notify the sender by reply transmission and delete the message without copying or disclosing it.

From: Youngman, Judith <Youngman@wtotrial.com>
Sent: Monday, November 6, 2023 6:12 PM
To: Swathi Bojedla <sbojedla@hausfeld.com>
Cc: Reilly, Katie <Reilly@wtotrial.com>
Subject: RE: AIR-RP Confidential Information & Contract

Swathi,

Attached is the complete email chain for Exhibit A with appropriate redactions in the blue highlighting. We also need to confirm that RealPage is okay with the redactions before plaintiffs' use this email. Please let me know before **9am MT tomorrow** if plaintiffs' counsel have any objection to my sharing of the attached email with RealPage's counsel to request their consent.

Best, Judith

Judith P. Youngman | Partner
Wheeler Trigg O'Donnell LLP
370 17th Street | Suite 4500 | Denver CO 80202
P 303.244.1865 | F 303.244.1879
youngman@wtotrial.com | wtotrial.com | [vCard](#)



This email contains confidential information from the law firm of Wheeler Trigg O'Donnell LLP and is attorney-client privileged and attorney work product. The information is intended solely for the use of the recipients. The unauthorized disclosure, copying, distribution, or use of the contents of this email is strictly prohibited. If you have received this email in error, please notify us at 303.244.1800 immediately.

From: Youngman, Judith
Sent: Monday, November 6, 2023 12:57 PM
To: Swathi Bojedla <sbojedla@hausfeld.com>
Cc: Reilly, Katie <Reilly@wtotrial.com>
Subject: RE: AIR-RP Confidential Information & Contract

Swathi,

We do not agree with Exhibit A. For purposes of context and completeness, plaintiffs' counsel needs to submit to the Court the entire email chain with appropriate redactions. We will prepare a redacted version of the complete email chain and send it to you before the end of the day.

Best, Judith

Judith P. Youngman | Partner

Wheeler Trigg O'Donnell LLP

370 17th Street | Suite 4500 | Denver CO 80202

P 303.244.1865 | F 303.244.1879

youngman@wtotrial.com | wtotrial.com | [vCard](#)



This email contains confidential information from the law firm of Wheeler Trigg O'Donnell LLP and is attorney-client privileged and attorney work product. The information is intended solely for the use of the recipients. The unauthorized disclosure, copying, distribution, or use of the contents of this email is strictly prohibited. If you have received this email in error, please notify us at 303.244.1800 immediately.

From: Swathi Bojedla <sbojedla@hausfeld.com>

Sent: Monday, November 6, 2023 12:12 PM

To: Youngman, Judith <Youngman@wtotrial.com>

Cc: Reilly, Katie <Reilly@wtotrial.com>

Subject: RE: AIR-RP Confidential Information & Contract

WARNING: This is an external email. Please take care when clicking links or opening attachments. When in doubt, contact the IS Department at i.s.dept@wtotrial.com

We are attaching the excerpted version, as most of the remaining emails would have to be redacted per your request. It will be noted in the cover declaration that the emails are excerpted.

Let me know by end of the day if you believe any other portions of the exhibits should be redacted.

SWATHI BOJEDLA

Partner

sbojedla@hausfeld.com

+1 202-540-7150 direct

Pronouns: she/her/hers

HAUSFELD

888 16th Street, N.W.

Suite 300

Washington, DC 20006

+1 202 540 7200

hausfeld.com

This electronic mail transmission from Hausfeld LLP may contain confidential or privileged information. If you believe you have received this message in error, please notify the sender by reply transmission and delete the message without copying or disclosing it.

From: Youngman, Judith <Youngman@wtotrial.com>
Sent: Monday, November 6, 2023 1:50 PM
To: Swathi Bojedla <sbojedla@hausfeld.com>
Cc: Reilly, Katie <Reilly@wtotrial.com>
Subject: RE: AIR-RP Confidential Information & Contract

Swathi,

Good morning. We're happy to discuss redactions. But I don't understand why plaintiffs' counsel would propose to submit an incomplete email chain to the Court for Exhibit A. Can you please explain your thinking? For your convenience, the email chain starts on September 11 with the attached email, which I sent referencing the allegations in dispute.

Best, Judith

Judith P. Youngman | Partner
Wheeler Trigg O'Donnell LLP
370 17th Street | Suite 4500 | Denver CO 80202
P 303.244.1865 | F 303.244.1879
youngman@wtotrial.com | wtotrial.com | [vCard](#)



This email contains confidential information from the law firm of Wheeler Trigg O'Donnell LLP and is attorney-client privileged and attorney work product. The information is intended solely for the use of the recipients. The unauthorized disclosure, copying, distribution, or use of the contents of this email is strictly prohibited. If you have received this email in error, please notify us at 303.244.1800 immediately.

From: Swathi Bojedla <sbojedla@hausfeld.com>
Sent: Friday, November 3, 2023 2:37 PM
To: Youngman, Judith <Youngman@wtotrial.com>
Cc: Reilly, Katie <Reilly@wtotrial.com>
Subject: RE: AIR-RP Confidential Information & Contract

WARNING: This is an external email. Please take care when clicking links or opening attachments. When in doubt, contact the IS Department at i.s.dept@wtotrial.com

Hi Judith, I hope all is well.

Here are the email exhibits we will be attaching to our opposition to your motion next week. We have redacted out any discussion of AIR's contract or even mention that it was provided. Let me know if you believe any additional portions should be redacted and we can discuss.

SWATHI BOJEDLA

Partner

sbojedla@hausfeld.com

+1 202-540-7150 direct

Pronouns: she/her/hers

HAUSFELD

888 16th Street, N.W.

Suite 300

Washington, DC 20006

+1 202 540 7200

hausfeld.com

This electronic mail transmission from Hausfeld LLP may contain confidential or privileged information. If you believe you have received this message in error, please notify the sender by reply transmission and delete the message without copying or disclosing it.

From: Youngman, Judith <Youngman@wtotrial.com>

Sent: Friday, October 13, 2023 4:53 PM

To: Swathi Bojedla <sbojedla@hausfeld.com>

Cc: Reilly, Katie <Reilly@wtotrial.com>

Subject: AIR-RP Confidential Information & Contract

CONFIDENTIAL – SUBJECT TO NDA AND FRE 408

Swathi,

[REDACTED]

[REDACTED]

Have a good weekend!

Best, Judith

Judith P. Youngman | Partner

Wheeler Trigg O'Donnell LLP

370 17th Street | Suite 4500 | Denver CO 80202

P 303.244.1865 | F 303.244.1879



This email contains confidential information from the law firm of Wheeler Trigg O'Donnell LLP and is attorney-client privileged and attorney work product. The information is intended solely for the use of the recipients. The unauthorized disclosure, copying, distribution, or use of the contents of this email is strictly prohibited. If you have received this email in error, please notify us at 303.244.1800 immediately.